

# *Exhibit A*



COMMONWEALTH OF PENNSYLVANIA  
OFFICE OF ATTORNEY GENERAL

May 11, 2006

TOM CORBETT  
ATTORNEY GENERAL

Office of Attorney General  
6<sup>th</sup> Floor, Manor Complex  
564 Forbes Ave.  
Pittsburgh, PA 15219  
(412) 565-3520  
(412) 565-3019(Fax No.)

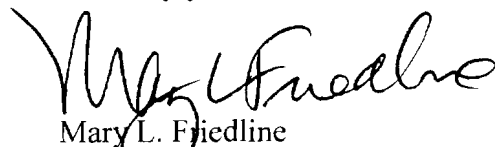
Anthony DeFranco, CZ-3518  
State Correctional Institution  
At Albion  
10745 Route 18  
Albion, PA 16475

RE: Anthony DeFranco v William Wolfe, et al., C.A. No. 04-230 E

Dear Mr. DeFranco:

Enclosed please find ***Defendants' Response to Plaintiff's Second Request for Production of Documents*** in the above-captioned case.

Sincerely yours,

  
Mary L. Friedline  
Senior Deputy Attorney General

MLF/cdc  
Enclosures

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA

ANTHONY DeFRANCO,  
Plaintiff,

V.

WILLIAM WOLFE, et al.,  
Defendants.

:  
: No. C.A. 04-230-E  
: Magistrate Judge Baxter  
: District Judge Cohill  
:  
:  
:

---

DEFENDANTS' RESPONSE TO  
PLAINTIFF'S 2<sup>ND</sup> REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 26 and Rule 34 of the Federal Rules of Civil procedure, plaintiff requests that the defendants produce the following documents. Please produce the documents at plaintiff's place of confinement at, 10745 Route 18, Albion, Pa. 16475-0002.

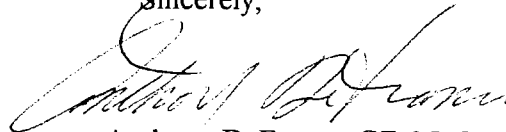
1. Please present all of the vote sheets involving plaintiff transfers in 2005. Under D.O.C. policy, a vote sheet is to be prepared before transfer. The vote sheets for transfer in 2005. SEE ATTACHED SHEET FOR RESPONSES.
2. Please present the unit log sign-in sheet, for staff, on D/A unit for the week of September 23-28, 2002. These sign-in logs are for staff who visit the unit each day.
3. Please provide all block report records (commonly known as a CAR)—these block reports are used to log in inmates behavior.
4. Dates and where plaintiff was housed at Albion from May 1, 2002 through June 30, 2002.
5. How many psychologist spoke with plaintiff, and who, from March 26, 2002 until June 25, 2002; list dates.
6. All information in plaintiff's file regarding his z-code from SCI Smithfield. All information regarding the z-code from SCI Smithfield.

Date: April 9, 2006  
enc. copy of 4/3/06 request to  
defendants for inspection of files.

**Certificate of service**

Service of the foregoing was  
made this date to the Attorney  
General's Office, 564 Forbes Ave.,  
Pgh., Pa. 15219.

Sincerely,



Anthony DeFranco CZ-3518  
10745 Route 18  
Albion, Pa. 16475-0002

***Defendants' Response to  
Plaintiff's Second  
Request for Documents  
Number 4***



cr3datclweb02

vkusiak 5/10/2006 3:34:01 PM

## Pennsylvania Department of Corrections

Return to DocNet

## Inmate Inquiry - Cell History

Production

DOC Info

Inmate Apps \ Inmate Inquiry \ Reports \ Photos \ JNET

Inmate #: C73518 ACTIVE Name: DEFRANCO, Anthony Wayne Cust Lvl: 3 Prog Cd: Y, Z Perm Loc: Albion  
 Race: White DOB: 12/23/1963 Sex: Male Housing Unit: D -A -1031-01 Temp Loc:  
 SID: 149-70-82-7 FBI #: 242913AA6 PBPP #: Counselor: Webb, Karla Jean

Community Corrections System  
Detainers: YES

Green Sheet:

Problematic  
offense: YES

Correspondence Tracking Location Building Section			Cell Dorm.	Bed No.	House Status	Sec. Level	Cust. Level	Date In	Date Out
<b>Inmate Employment</b>									
PIT			Hold					08/31/1998	10/20/1999
Inmate Status	BT	06	BUS				3	10/20/1999	10/20/1999
<b>Integrated Case Summary</b>			Hold				3	10/20/1999	10/20/1999
024	V1	29	BUS				3	10/20/1999	10/20/1999
<b>Rick Names</b>			Hold					10/20/1999	10/20/1999
ALB			1030	02		4	3	10/20/1999	10/26/1999
<b>Sentencing</b>			Hold					10/26/1999	10/26/1999
ALB	F	A	2063	01		3	3	10/26/1999	12/03/1999
<b>Transfer Petition</b>			2064	02		3	3	12/03/1999	03/04/2000
<b>Unit Management</b>			Hold					12/03/1999	12/03/1999
<b>Visitor Tracking</b>			ALB	A	1029	01	3	03/04/2000	07/14/2000
ALB	H	C	2023	01	RHU	5	5	07/14/2000	07/19/2000
ALB	F	A	1029	01		3	3	07/19/2000	03/27/2002
ALB	H	B	1009	01	RHU	5	5	03/27/2002	04/25/2002
ALB	J	A	2058	01		4	4	04/25/2002	05/14/2002
ALB			Hold					04/25/2002	04/25/2002
ALB	J	A	1023	01		4	4	05/14/2002	06/24/2002
ALB	C	A	1032	01		3	4	06/24/2002	07/12/2002
ALB			Hold					07/12/2002	07/12/2002
ALB	H	D	2022	01	RHU	5	5	07/12/2002	08/15/2002
ALB	J	B	1021	01		4	4	08/15/2002	08/19/2002
ALB	D	A	2057	02		3	4	08/19/2002	08/22/2002
ALB			Hold					08/22/2002	08/22/2002
ALB	D	A	2057	01		3	4	08/22/2002	01/02/2004
ALB			Hold					01/02/2004	01/05/2004
ALB	D	A	2057	01		3	3	01/05/2004	05/12/2004
ALB			Hold					05/12/2004	05/12/2004
ALB	D	A	2057	02		3	3	05/12/2004	11/03/2004
ALB			Hold					11/03/2004	11/03/2004
ALB	D	A	1032	01		3	3	11/03/2004	03/08/2005
037	B1	58	BUS				3	03/08/2005	03/08/2005
SMI			Hold					03/08/2005	03/08/2005
SMI	H	A	2030	01		4	3	03/08/2005	03/24/2005
SMI	H	A	2026	01		4	3	03/24/2005	03/28/2005
SMI	C	A	1016	01		3	3	03/28/2005	08/02/2005
037	B1	00	BUS				3	08/02/2005	08/02/2005
ALB			Hold					08/02/2005	08/11/2005
ALB	D	A	1031	01		3	3	08/11/2005	Current

Prior Inmate #

BD6903

**Identification:**  
 (Inmate #/SID/  
 Phil. Photo #/SSN)



cr3datctrweb02

## Pennsylvania Department of Corrections

Return to DocNet

vkusiak 5/10/2006 3:34:34 PM

## Inmate Inquiry - Cell History

Production

DOC Info

Inmate Apps \ Inmate Inquiry \ Reports \ Photos \ JNET

Inmate #: C23518 ACTIVE Name: DEFRANCO, Anthony Wayne Cust Lvl: 3 Prog Cd: Y, Z Perm Loc: Albion  
 Race: White DOB: 12/23/1963 Sex: Male Housing Unit: D -A -1031-01 Temp Loc:  
 SID: 149-70-82-7 FBI #: 242913AA6 PBPP #: Counselor: Webb, Karla Jean

Community Corrections System  
Detainers: YES

Green Sheet:

Problematic  
offense: YES

Correspondence Tracking Location Building Section			Cell Dorm.	Bed No.	House Status	Sec. Level	Cust. Level	Date In	Date Out
<b>Inmate Employment</b>									
PIT			Hold					08/31/1998	10/20/1999
Inmate Status	BT	06	BUS				3	10/20/1999	10/20/1999
<b>Integrated Case Summary</b>									
024			Hold				3	10/20/1999	10/20/1999
Work Names	V1	29	BUS				3	10/20/1999	10/20/1999
ALB			Hold					10/20/1999	10/20/1999
ALB	RTSP							10/20/1999	10/20/1999
ALB	J	B	1030	02		4	3	10/20/1999	10/26/1999
<b>Sentencing</b>									
ALB			Hold					10/26/1999	10/26/1999
ALB	F	A	2063	01		3	3	10/26/1999	12/03/1999
ALB	F	A	2064	02		3	3	12/03/1999	03/04/2000
<b>Unit Management</b>									
ALB			Hold					12/03/1999	12/03/1999
<b>Visitor Tracking</b>									
ALB	F	A	1029	01		3	3	03/04/2000	07/14/2000
ALB	H	C	2023	01	RHU	5	5	07/14/2000	07/19/2000
ALB	F	A	1029	01		3	3	07/19/2000	03/27/2002
ALB	H	B	1009	01	RHU	5	5	03/27/2002	04/25/2002
ALB	J	A	2058	01		4	4	04/25/2002	05/14/2002
ALB			Hold					04/25/2002	04/25/2002
ALB	J	A	1023	01		4	4	05/14/2002	06/24/2002
ALB	C	A	1032	01		3	4	06/24/2002	07/12/2002
ALB			Hold					07/12/2002	07/12/2002
ALB	H	D	2022	01	RHU	5	5	07/12/2002	08/15/2002
ALB	J	B	1021	01		4	4	08/15/2002	08/19/2002
ALB	D	A	2057	02		3	4	08/19/2002	08/22/2002
ALB			Hold					08/22/2002	08/22/2002
ALB	D	A	2057	01		3	4	08/22/2002	01/02/2004
ALB			Hold					01/02/2004	01/05/2004
ALB	D	A	2057	01		3	3	01/05/2004	05/12/2004
ALB			Hold					05/12/2004	05/12/2004
ALB	D	A	2057	02		3	3	05/12/2004	11/03/2004
ALB			Hold					11/03/2004	11/03/2004
ALB	D	A	1032	01		3	3	11/03/2004	03/08/2005
037	B1	58	BUS				3	03/08/2005	03/08/2005
<b>SMI</b>									
SMI			Hold					03/08/2005	03/08/2005
SMI	H	A	2030	01		4	3	03/08/2005	03/24/2005
SMI	H	A	2026	01		4	3	03/24/2005	03/28/2005
SMI	C	A	1016	01		3	3	03/28/2005	08/02/2005
037	B1	00	BUS				3	08/02/2005	08/02/2005
ALB			Hold					08/02/2005	08/11/2005
ALB	D	A	1031	01		3	3	08/11/2005	Current

Prior Inmate #

BD6903

**Identification:**  
 (Inmate #/SID/  
 Phil. Photo #/SSN)

05/10/2006 16:08 FAX 8147569733

SCT ALBION



cr3datctrweb02

## Pennsylvania Department of Corrections

Return to DocNet

vkuslak 5/10/2006 3:21:05 PM

## Inmate Inquiry - Cell History

Production

DOC Info

Inmate Apps \ Inmate Inquiry \ Reports \ Photos \ JNET

Inmate #: CZ3518 ACTIVE Name: DEFRANCO, Anthony Wayne Cust Lvl: 3 Prog Cd: Y, Z Perm Loc: Albion  
 Race: White DOB: 12/23/1963 Sex: Male Housing Unit: D -A -1031-01 Temp Loc:  
 SID: 149-70-82-7 FBI #: 242913AA6 PBPP #: Counselor: Webb, Karla Jean

Detainers: YES

Green Sheet:

Problematic  
offense: YES

Location	Building	Section	Cell Dorm.	Bed No.	House Status	Sec. Level	Cust. Level	Date In	Date Out
PIT			Hold					08/31/1998	10/20/1999
029	B1	06	BUS				3	10/20/1999	10/20/1999
SMI			Hold				3	10/20/1999	10/20/1999
024	V1	29	BUS				3	10/20/1999	10/20/1999
ALB			Hold					10/20/1999	10/20/1999
ALB	J	B	1030	02		4	3	10/20/1999	10/26/1999
ALB			Hold					10/26/1999	10/26/1999
ALB	F	A	2063	01		3	3	10/26/1999	12/03/1999
ALB	F	A	2064	02		3	3	12/03/1999	03/04/2000
ALB			Hold					12/03/1999	12/03/1999
ALB	F	A	1029	01		3	3	03/04/2000	07/14/2000
ALB	H	C	2023	01	RHU	5	5	07/14/2000	07/19/2000
ALB	F	A	1029	01		3	3	07/19/2000	03/27/2002
ALB	H	B	1009	01	RHU	5	5	03/27/2002	04/25/2002
ALB	J	A	2058	01		4	4	04/25/2002	05/14/2002
ALB			Hold					04/25/2002	04/25/2002
ALB	J	A	1023	01		4	4	05/14/2002	06/24/2002
ALB	C	A	1032	01		3	4	06/24/2002	07/12/2002
ALB			Hold					07/12/2002	07/12/2002
ALB	H	D	2022	01	RHU	5	5	07/12/2002	08/15/2002
ALB	J	B	1021	01		4	4	08/15/2002	08/19/2002
ALB	D	A	2057	02		3	4	08/19/2002	08/22/2002
ALB			Hold					08/22/2002	08/22/2002
ALB	D	A	2057	01		3	4	08/22/2002	01/02/2004
ALB			Hold					01/02/2004	01/05/2004
ALB	D	A	2057	01		3	3	01/05/2004	05/12/2004
ALB			Hold					05/12/2004	05/12/2004
ALB	D	A	2057	02		3	3	05/12/2004	11/03/2004
ALB			Hold					11/03/2004	11/03/2004
ALB	D	A	1032	01		3	3	11/03/2004	03/08/2005
037	B1	58	BUS				3	03/08/2005	03/08/2005
SMI			Hold					03/08/2005	03/08/2005
SMI	H	A	2030	01		4	3	03/08/2005	03/24/2005
SMI	H	A	2026	01		4	3	03/24/2005	03/28/2005
SMI	C	A	1016	01		3	3	03/28/2005	08/02/2005
037	B1	00	BUS				3	08/02/2005	08/02/2005
ALB			Hold					08/02/2005	08/11/2005
ALB	D	A	1031	01		3	3	08/11/2005	Current

Prior Inmate #

BD6903

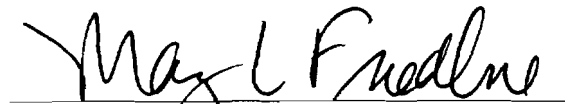
Identification:

(Inmate #/SID/  
Phil. Photo #/SSN)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing  
***Defendants' Response to Plaintiff's Second Request for Production of Documents*** was  
served upon the following, by first-class mail this May 11, 2006.

Anthony DeFranco, CZ-3518  
State Correctional Institution  
At Albion  
10745 Route 18  
Albion, PA 16475

  
\_\_\_\_\_  
MARY L. FRIEDLINE  
Senior Deputy Attorney General